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To: Paul Argyropoulos
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Subject: Re: Initial Thoughts for NSC Discussion
Date: 01/07/2010 09:50 AM

The other main issue is with respect to Generation of RINs

- Importers (US entities) can generate RINs upon importation (and denaturing in the case of ethanol) if they have the pedigree of the feedstock/fuel from the upstream producer and the foreign producer did not generate the RIN
- Foreign producers can generate the RIN as well, but there is a whole set of additional reg provisions associated with them since we can't enforce overseas. Its still allowed, but there are other hoops. This is where the posting of a bond comes in, as well as segregation requirements, etc. John W. should be able to fill it in more.

We expect most imports will come through importers (like it does today), but we had to allow a means for foreign producers to do it as well - and we have

Paul

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Cc: stewart.lori@epa.gov
Date: 01/06/2010 12:47 PM
Subject: Initial Thoughts for NSC Discussion

To get things moving in prep for tomorrow discussion with Margo and prep for pre-brief for Friday's NSC meeting

General thought is to run thru RFS2 nuts and bolts briefing and then incorporate issues / areas of interest with focus on international areas of interest in the rule and reactions. The following are my initial thoughts on the key areas that should be covered:

Key international areas of interest

Biomass / Feedstock Requirements

US ag / crops – Aggregate compliance with trigger and opt for ind record keeping or consortium

- o Int'l – ind or consortium based record keeping and map and track (with option for aggregate if county can provide sufficient data to support aggregate compliance)
- o US and Int'l Forest / non ag sector – record keeping – map and track or consortium

Grandfathering of Facilities for General Total Renewable Fuel Category Applies

Applying LCA assessment results to all domestic and foreign produced fuels of same feedstock/process/fuel pathways we have currently modeled

- o Also notation about petition process etc.

Registration requirements – same except for posting a bond. Similar as done in previous fuel programs.

Other thoughts, issues, ideas?

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